

# **EXHIBIT 5A**

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IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

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SIRI DIAZ, CAROLYN SIEGEL, TALIA BUMB, BLERTA  
VIKKI, DANIELLE OWIMRIN, on behalf of themselves  
and others similarly situated,

Plaintiffs,

-against-

SCORES HOLDING COMPANY, INC.; GO WEST  
ENTERTAINMENT, INC. a/k/a SCORES WEST SIDE, and  
SCORES ENTERTAINMENT, INC., a/k/a SCORES EAST  
SIDE

Defendants.

CIVIL ACTION NO.: 07 Civ. 8718(RMB)

-----x  
200 Park Avenue  
New York, New York

January 28, 2008  
10:10 a.m.

DEPOSITION of BLERTA VIKKI, one of  
the Plaintiffs herein, pursuant to Notice,  
before Ronald A. Marx, a Notary Public of the  
State of New York.

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1 VIKKI

2 week. You know, and if you couldn't work, you  
3 just have to call and say -- you know, say to  
4 the manager, "Sorry, I can't come to the work."

5 Q Now, when you say you had to work  
6 five nights, what do you mean by that?

7 A I mean by that was a shift. You  
8 know, we had to work -- I mean, was working  
9 there less than two years, you have to be at  
10 work, because I used to work a lot, some -- like  
11 some years.

12 And I had to work five nights a week,  
13 and it's -- you know, it's a mandatory five  
14 nights a week I had to work.

15 Q What I'm trying to understand is did  
16 you decide you had to work five nights a week --

17 A No.

18 Q -- or did somebody tell you you had  
19 to work five nights?

20 A Somebody told me I have to work five  
21 nights a week.

22 Q Who is it that told you you had to  
23 work five nights a week?

24 A The manager and the house mom. I  
25 mean, she gets manager from the -- whatever.

1 VIKKI

2 Q Who was the manager that told you  
3 that?

4 A Robert.

5 Q Robert?

6 A Yes.

7 Q Okay. And when did he tell you this?

8 A Since beginning when I start.

9 Q When did you start?

10 A I start -- I worked there was  
11 March '04. February, March. I mean, one of  
12 those.

13 Q Okay. Now, is this something that  
14 Robert told you before you started working?

15 A No. When you start working over  
16 there, when you audition and start to work and,  
17 you know -- I mean, the house mom or manager is  
18 explained to you you have to work -- if you  
19 going to get hired, you have to work five nights  
20 a week, and this time until that time.

21 Q I'm trying to understand when this  
22 was told to you.

23 A As soon you start it. First day when  
24 I started with Scores.

25 Q So you had an audition, you said?

1 VIKKI

2 A Yes.

3 Q And was this told to you before or  
4 after the audition?

5 A After. After I got hired.

6 Q After you got hired?

7 A Yes.

8 Q And was there a specific time you  
9 were told to work?

10 A Yes.

11 Q What time was that?

12 A 6:30 I had to be in the dressing  
13 room.

14 Q 6:30 you had to be in the dressing  
15 room?

16 A Yes. By 7 o'clock I had to be on the  
17 floor.

18 Q And when did your shift end?

19 A 3 o'clock.

20 Q 3 o'clock in the morning?

21 A Yes.

22 Q Now, you said Robert told you this  
23 before -- after your audition, but before you  
24 started work?

25 A Yes.

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1 VIKKI

2 Q Is that yes?

3 A Yes.

4 Q And did Robert ever discuss when you  
5 had to work or the number of days a week you had  
6 to work after you started working?

7 A What you mean by that? Qualify the  
8 question, please.

9 Q Let me break it down. After -- after  
10 that first conversation you had with him, which  
11 you said took place after your audition, did you  
12 ever have a discussion with Robert again about  
13 how many nights a week you needed to work?

14 A I didn't have discussion like, but  
15 when I was coming -- if I was -- I mean,  
16 sometimes I couldn't work five nights a week,  
17 and I was working three nights.

18 And when I was coming, he would come  
19 after me and say, you know, "You should call.  
20 Don't repeat anymore, you know. I don't want  
21 this to happen anymore. You have to work five  
22 nights since we hire -- we hired you."

23 Q And how many times did you have that  
24 kind of discussion that you just described?

25 A I mean, it was not that many, because

1 VIKKI

2 I was always, you know, on track. I always --

3 Q On track?

4 A I always was on time, and I didn't  
5 want, you know, myself to be in trouble, you  
6 know. But couple of times, you know.

7 Q All right. You also mentioned a  
8 conversation with the house mom. Who was the  
9 house mom?

10 A It's Lisa or Gina.

11 Q Lisa or Gina?

12 A Yes.

13 Q Two different house moms?

14 A Yes.

15 Q What is it that Lisa told you about  
16 how -- how -- when you had to work?

17 A When they hired me, she has -- you  
18 know, she was explaining all the rules of the  
19 club.

20 You have to work five nights a week,  
21 and when you're new you have to work two days a  
22 week Sundays, because there was nobody, you  
23 know, that -- nobody wants to work Sundays.

24 And she just said you have to work  
25 two days a week Sundays, two nights a week

1 VIKKI

2 Sundays for you to, you know -- to try to work  
3 in Scores.

4 Q So this was a conversation you had  
5 with Lisa after your audition?

6 A I mean, you know, the rules of the  
7 club and everything. You know. I mean, how  
8 the --

9 Q Let me just break it down though. I  
10 want to understand.

11 You just described -- was that a  
12 conversation you had with Lisa --

13 A About --

14 Q -- after your audition?

15 A I had -- you know, about everything,  
16 you know. When I was working -- I mean, she has  
17 to explain to me everything, you know, what I  
18 should wear and stuff, you know, about the time,  
19 about, you know, we have to work this kind of  
20 shift. That's what they're looking for.

21 Q Let's just stick to the conversation  
22 about when you needed to work. Okay?

23 And I'm just asking you when that  
24 conversation took place.

25 A Soon I start.

1 VIKKI

2 Q After you started, did you have any  
3 additional discussions with Lisa about when you  
4 had to work?

5 A No, because she explained to me first  
6 time, and that was keeping that kind of shift.

7 Q Let's talk about Gina then. When did  
8 you have any discussions with Gina about when  
9 you needed to work?

10 A She would explain to me same thing  
11 that Lisa did because, you know, it's...

12 Q When did she do that?

13 A The first time I see her, you know,  
14 because she was asking me, "Who hired you?" And  
15 she was explaining to me same thing what Lisa,  
16 you know, explained to me.

17 Q Was Gina there when you first  
18 started?

19 A No. She was working different nights  
20 a week.

21 Q Okay. Let me understand. Gina asked  
22 you who hired you?

23 A "Who was over here that hired you?"  
24 Yes.

25 Q And what did you say in response to

1 VIKKI

2 exact, you know. And on tips, you know.

3 Q Plus tips?

4 A Yes.

5 Q Were you paid the same way as a  
6 waitress and as hostess?

7 A Yes, because I was getting tips as  
8 the hostess.

9 Q And prior to working at Marathon  
10 Grill, where did you work?

11 A Nowhere.

12 Q Nowhere?

13 A Yes. Just came in this country.

14 Was --

15 Q Where did you come from?

16 A Albania.

17 Q From Albania?

18 A Yes.

19 Q Did you work in Albania?

20 A No. I was in school there.

21 Q So your first job upon coming to the  
22 U.S. was at Marathon Grill?

23 A Yes.

24 Q And then your next job was at Scores?

25 A Correct.

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VIKKI

2 Q Now, did you ever work -- you said  
3 you worked at the west side club. Did you ever  
4 work at the east side club?

5 A Yes.

6 Q When did you do that?

7 A After nine months I work in the west  
8 side I worked in the east side.

9 Q But you started on the west side?

10 A Yes.

11 Q Now, when you started on the east  
12 side, did anybody speak to you about what your  
13 job would be on the east side?

14 A They speak with me, the house mom,  
15 but it was the same rules.

16 Q Well, who was the house mom?

17 A The same house mom.

18 Q So they were the same house moms on  
19 the east and the west side?

20 A Yes, because the west side got  
21 already house moms, you know. They just open  
22 up, and then they shared stuff until the west  
23 side would get enough staff -- you know, staff  
24 to work.

25 Q So did Lisa or Gina -- was there a

1 VIKKI

2 manager on the east side at that time?

3 A It was the same manager, Robert. In  
4 the east side is the same manager, but he moves  
5 back and forth. He goes to west and east side.

6 That time he was on east side until  
7 the west side could get -- you know. I don't  
8 know. I was working there at that time.

9 Q Did you have to apply for a position  
10 on the east side?

11 A No. I just switched. He said I  
12 didn't have to apply. If I was working Scores,  
13 you can work any Scores.

14 Q Did anyone request that you move to  
15 the east side?

16 A No.

17 Q Did you decide you wanted to move to  
18 the --

19 A Yes. I asked the manager. He said  
20 okay, no problem.

21 Q You asked the manager if you could  
22 work on the east side?

23 A Yes. I asked Robert. I said, "I  
24 want to work here." He said, "That's fine. I'm  
25 going to talk to the managers on the west side."

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VIKKI

2 Q Did you work at any other club  
3 besides Scores West and Scores East?

4 A I worked for a week in Florida  
5 because they send us, Miami. I don't know the  
6 address, but they paid for us to go there when  
7 they opened the club.

8 Q So where in Miami did you work?

9 A It was a Scores in Miami. I don't  
10 know what it was address, but I remember it was  
11 Biscayne -- Biscayne Boulevard.

12 I don't know -- they paid for us.  
13 They paid everything. They sent about 10, 15  
14 girls.

15 Q Did you work anywhere else other than  
16 those three locations you just identified?

17 A No.

18 Q How did you learn to be a dancer?

19 A What you mean? Clarify the question,  
20 please?

21 Q Well, did you consider yourself a  
22 dancer when you worked at the club?

23 A Not really, no.

24 Q What did you consider yourself to be?

25 A I was going to school, and I was

1 VIKKI

2 call the manager."

3 And I got dressed, went downstairs.

4 And, you know, I had to dance one song on the  
5 stage.

6 And after that she say, "Go upstairs.

7 I'm going to come to the dressing room," and she  
8 was like, "You hired."

9 Q Okay. So you got dressed. By the  
10 way, which -- which of the house moms was this;  
11 do you remember?

12 A Would be Lisa or Marguerite. I think  
13 it was both, because the club just opened. It  
14 was -- you know, it was crossing the street  
15 together. I really don't remember, but would be  
16 one of those.

17 Q Marguerite?

18 A Marguerite, yes.

19 Q So they told you to get dressed in  
20 the dressing room?

21 A Yes. "When you're ready, let me  
22 know. We're going to go downstairs. You're  
23 going to dance one song on the stage, and you're  
24 going to come up after that, upstairs again, and  
25 I'm going to go from there.

1 VIKKI

2 "If you're hired or not, the manager  
3 is going to let me know," you know, and that's  
4 what I did. And I -- the manager said, "Okay.  
5 She's hired."

6 Q Who was the manager?

7 A Was Robert. The manager was Robert.  
8 That I'm sure.

9 Q Okay. Now, when you got dressed in  
10 the dressing room, did you have any clothes that  
11 you brought?

12 A Actually I had, but she was like,  
13 "You can't wear these clothes. I give you dress  
14 for now, and when you get hired you going to buy  
15 your own dresses. You have to buy those  
16 dresses. We sell you here those kind of  
17 dresses," because the circle -- designer or  
18 something.

19 What I should say was you couldn't  
20 wear any kind of dresses. You know, they had to  
21 be the dresses they accepted.

22 Q What kind of clothes did you bring?

23 A I brought, I mean, normal dress. But  
24 they don't -- you know, they have to -- had to  
25 be more -- I mean, I really don't know -- how

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2 should I clarify that?

3           But they had to be -- I mean, the  
4 kind of dresses, you know, that was -- that  
5 uniform, not -- you know, my dress was too much  
6 clothes. Just like regular dress you can go out  
7 for dinner. It was not the kind of dress they  
8 was looking for.

9           Q       So you had to -- I'm sorry. You said  
10 that -- what was -- what was the kind of dress  
11 that you needed to wear?

12          A       You can't wear the dress to go out  
13 for dinner. That's for sure. And you can't --  
14 I understand pretty good what kind of dress it  
15 would be.

16           If you can't wear the dress to go out  
17 what's -- I mean, what kind of dress it have to  
18 be? It's pretty much --

19          Q       Well, how did the dress that you had  
20 to wear compare to the dress that you brought?

21          A       It's completely two different, you  
22 know.

23          Q       I understand that, and I'm asking  
24 you, what was the difference between the dress?

25          A       Because my dress was a normal dress.

1 VIKKI

2 It's, you know, normal. You can go anywhere. I  
3 could go out for dinner with my dress.

4 But the dress they had was much -- I  
5 don't know what word I should use for that. It  
6 was, you know, the type of dress they was  
7 looking for, like more open up, you know, to  
8 show off.

9 MR. CAPOBIANCO: I think she  
10 said up and up.

11 A Open up.

12 Q Oh, open up?

13 A Yes. I mean, they know better.

14 Q So aside from the dress, were there  
15 other clothing you put on in the dressing room?

16 A I had to put on the high heels, and  
17 they told me you can't put those high heels,  
18 because this was like closed high heels.

19 You have to be open up high heels,  
20 like -- like a sandal. I had like a -- you  
21 know, like the part of the feet are, there  
22 should not be closed.

23 They have to be open high heel, not  
24 platform or whatever. They had a certain type  
25 of a high heel you had to wear over there.

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VIKKI

2 Q So you brought your own high heels?

3 A Yes, but I couldn't wear those, and  
4 they give me a pair of high heels when I  
5 audition, and then when they hired me I had to  
6 buy whatever, you know, there was to the uniform  
7 I should buy over there, or I could buy it  
8 anywhere, but have to be, you know, for them  
9 part of the uniform, you know.10 Q What I'm trying to find out is what  
11 was the difference between the high heels you  
12 brought and the high heels you needed to wear at  
13 the club?14 A Because my high heels what I brought  
15 was not really high heels. It was a high heel,  
16 but a normal high heels you can wear every day,  
17 what I should say.18 And their high heels was like -- you  
19 know, was really high heels, and you had to wear  
20 like -- I don't know what I should explain.

21 Like how --

22 Q You mean they showed more skin?

23 A Yes. You know, like much -- I don't  
24 know how I should explain.

25 Q Were there any other clothes besides

1 VIKKI

2 the dress and the high heels?

3 A The underwear.

4 Q Underwear. What was the issue with  
5 the underwear?

6 A You have to wear the underwear they  
7 were selling in the club.

8 Q What kind of underwear was it?

9 A What do you mean, what kind of  
10 underwear? It was --

11 Q Did you bring your own underwear when  
12 you came to the club?

13 A Yes. I couldn't wear those either,  
14 because they have their own design. You know --  
15 I mean, I don't know.

16 Q You mean Scores had its own design  
17 for underwear?

18 A Yes. Somebody used to make those.

19 Q What kind of -- what does it look  
20 like?

21 A It looks --

22 Q What color was it?

23 A Every color. Different colors.

24 Q You could get a lot of different  
25 colors?

VIKKI

<sup>2</sup> A Yes. It's not a matter about color.

3            0        Did it look like your underwear?

4 A No.

5 Q Could you wear that underwear you got  
6 from Scores elsewhere?

7           A       Not comfortable, but like personally  
8 to me, no. But I don't know if somebody else.  
9 I couldn't wear it.

10 Q But could you wear it?

11           A       I was not -- I don't know, like  
12 comfortable. I don't know what I should say.  
13 Just not for --

14 Q You're saying you didn't find that  
15 underwear comfortable?

16           A       Yes. I mean, I had to wear those to  
17 work over there. I had -- I didn't have any  
18 other choice, but outside there I would not wear  
19 it.

20 Q Aside from the underwear, what else?  
21 What -- was there anything else you needed to  
22 put on in the dressing room?

23 MS. GREENE: Objection. Are  
24 you still referring to the first  
25 audition or just in general?

1 VIKKI

2 Q Well, let's talk about the first  
3 audition.

4 A What do you mean, first audition?

5 Q The audition you had at Scores West.

6 A It's the same.

7 Q First time.

8 A Yes. It's the same thing with the  
9 east side. Was same uniform. It's the same.

10 Q But let me ask you this. You talked  
11 about the dress.

12 A Yes.

13 Q You talked about the high heels. You  
14 talked about the underwear.

15 A Yes.

16 Q Was there anything else you needed to  
17 wear for your audition?

18 A No. That's it.

19 Q Okay. Now you -- and then you said  
20 you came down the stairs?

21 A Yes.

22 Q And you --

23 A The house mom.

24 Q And you went on the stage?

25 A Yes.

1 VIKKI

2 A Yes.

3 Q Did you know that you were going to  
4 take off -- have to take off your clothes when  
5 you went on the stage before you she told you  
6 that?

7 A No.

8 Q That was the first you knew?

9 A Yes.

10 Q And what else did Lisa or Marguerite  
11 tell you after she told you you were hired?

12 A What you mean?

13 Q Did she tell you when you would start  
14 or what time?

15 A Yes. Oh, yes. She said, you know,  
16 "You can start tonight or tomorrow." And she  
17 said, "Before you start I'm going to give you  
18 audition, you know, about the club, the rules  
19 and" -- and I didn't start that night, because I  
20 didn't have, you know, the dress with me, and I  
21 didn't have the money to pay, because I had to  
22 pay for the dress to go to work.

23 Next day I start. I bought the  
24 dress. I bought everything over there before I  
25 started to work. She would explain to me all

1 VIKKI

<sup>2</sup> the rules, you know, everything about the club.

3 Q Okay. So let me ask you. Where did  
4 you buy the dress?

## A At Scores.

6 Q You bought it at Scores. Did you  
7 understand that you had to buy it from Scores?

8 A Yes.

9 Q Or did you understand you could buy  
10 it somewhere else?

11           A       I had to buy from Scores, because I  
12       couldn't find the dress what they were looking  
13       for anywhere else.

14 Q Did you have the money to buy the  
15 dress?

16           A       I took a +- you know, I took it from  
17 my account, I mean.

18 Q So you had the money to buy the  
19 dress?

20 A Yes.

21 Q Okay. And what else did you have to  
22 purchase to work your first night?

23                   A         You mean what I should pay out, or  
24       what you mean by that?

25 Q Well, what did you have to buy to

1 VIKKI

2 wear?

3 A I had to pay for the dress. I had to  
4 pay for high heels. I had to pay for underwear.  
5 I have to pay for garters.

6 Q Now, is a garter different from the  
7 underwear, or is that the same thing?

8 A No. It's different from underwear.

9 Q So there was underwear and there's a  
10 garter?

11 A Yes.

12 Q Okay. And you bought all of those  
13 things from Scores?

14 A Yes.

15 Q Do you remember how much they were?

16 A I remember dress was \$180. I  
17 remember. The high heels was \$80, and the  
18 underwear was 40, and the garter 20.

19 Q And then once you purchased those  
20 things, did they belong to you?

21 A Yes.

22 Q Were they all new when you purchased  
23 them?

24 A I believe yes. But who knows?

25 Q Now, while you were working at

1 VIKKI

2 Scores, did you have to purchase any other  
3 clothing?

4 A Yes. I couldn't wear -- if I was  
5 wearing the one dress, I would say two weeks  
6 they would come to me and say you have to change  
7 your dress and buy a different dress, and I had  
8 to buy it.

9 Q Who was they?

10 A They? The manager. They come to me  
11 and say, "Blerta, you have to buy a new dress  
12 because you're wearing this dress same -- you  
13 know, every time."

14 Q So how many dresses did you have to  
15 buy?

16 A Probably 20.

17 Q 20 dresses?

18 A Yes.

19 Q And did they all cost about \$180?

20 A Yes.

21 Q Did you buy them all from Scores?

22 A Yes.

23 Q Did you ever look elsewhere for  
24 dresses?

25 A No, because I never -- I looked, but

1 VIKKI

2 I never found right ones, you know, that Scores  
3 would accept it.

4 Q So you looked elsewhere for dresses?

5 A Yes, but I couldn't find the kind  
6 of -- you know, that kind of -- type of dresses.

7 Q And -- I'm sorry. Did you say they  
8 were all \$180?

9 A Yes.

10 Q And the high heels, how many pairs of  
11 high heels did you end up buying?

12 A Be about ten to 15. I mean, maybe  
13 more. I don't remember. It's hard question. I  
14 had to look different. I don't remember.

15 Q Now, where did you purchase the high  
16 heels from?

17 A Scores.

18 Q All from Scores?

19 A (Indicating)

20 Q Did you look anywhere else to  
21 purchase high heels?

22 A No. It was just from Scores.

23 Q Now -- and how many pairs of  
24 underwear did you have to buy?

25 A Plenty. I don't remember how many.

1 VIKKI

2 Q Plenty.

3 A I bought -- I don't remember. It's a  
4 hard question for me, because I don't remember.

5 It's --

6 Q I'm just asking you to give an  
7 estimate based on how many --

8 A Could be 20 pairs or -- you know,  
9 maybe. I mean, I don't...

10 Q And where did you purchase the  
11 underwear from?

12 A Scores.

13 Q Did you look anywhere else for  
14 underwear?

15 A No, because I never found those  
16 underwears. It was completely new.

17 Q What about the garters? How many  
18 garters did you have?

19 A Garters, every three days one garter,  
20 because always I was losing in Scores.

21 Q You purchased them all from Scores?

22 A Yes.

23 Q So you bought a new garter every  
24 three days?

25 A You know, I was losing them. I would

1 VIKKI

2 forget them. I was in the dressing room or  
3 whatever. Next day would be -- I don't know  
4 where it is.

5 Q And you always purchased it from  
6 Scores?

7 A (Indicating)

8 Q Did you ever look anywhere else for  
9 garters?

10 A No. It's a certain type of garters.  
11 I couldn't find anywhere. Like they made their  
12 own design, you know. It's --

13 Q Now, the high heels that you  
14 purchased, could you wear those high heels  
15 outside of work?

16 A To me, no, because I'm not  
17 comfortable. I would not -- they would not look  
18 good. Like personally I'm talking for myself.  
19 I don't know for anybody else.

20 Q They weren't your personal taste in  
21 high heels?

22 A No.

23 Q But you say somebody else could have  
24 worn such a thing?

25 A Could be. I don't know about

1 VIKKI

2 somebody else.

3 Q What about the dresses? You said you  
4 wouldn't wear those dresses outside?

5 A Nobody will wear those dresses out.

6 Q Nobody would wear those dresses?

7 A No. Completely not.

8 Q This is New York. Nobody would wear  
9 those dresses out?

10 A Could be New York, but I don't think  
11 those dresses would be -- no.

12 Q You don't think so.

13 A Yes. Thousand percent, no.

14 Q Now, why did you ask to go from the  
15 west side to the east side?

16 A Why? I just -- I just want to switch  
17 clubs, you know, and -- I don't know. Just  
18 feel -- I got -- not tired, but I just felt to  
19 switch clubs and just wanted to change, to move.

20 Q Was there somebody that you wanted to  
21 work with?

22 A No. Not really, but I just -- not  
23 feeling, you know, myself there. I just wanted  
24 to move, you know.

25 Q Was it easier for you to get to the

VIKKT

<sup>2</sup> east side club?

3           A       It was easy to get, because I was  
4       taking the train, you know, from my house there.  
5       It was easy than to the west side. I had to --  
6       you know, it's hard for me in the nighttime to  
7       get back home.

8           Q        Okay. Now, let me ask you that. How  
9 did you get to -- when you worked on the west  
10 side, how did you get there?

11 A By train and bus.

12 Q Where did you live? Where were you  
13 living when you first started working?

<sup>14</sup> A Brooklyn.

## 15 Q Where in Brooklyn?

16           A       Bensonhurst. You want directly the  
17 address?

18 Q What was your address when you first  
19 started working there?

20           A        I give you two addresses. I don't  
21 remember which. One is 6412 20th Avenue,  
22 Brooklyn, New York 11204. I believe it's the  
23 zip code.

24 Q That was 20th Avenue?

25 A      Correct.

1 VIKKI

2 Q Did you ever get a ride from anybody?

3 A No. Like when I was -- the train was  
4 not working I had to take a cab. I had to go to  
5 work.

6 And if I would not go, they would  
7 have fired me. I called. I said I don't know  
8 how I'm going to get, you know. "You have to  
9 take cab ride or just take whatever."

10 Q When you came -- when you worked on  
11 the east side, how did you get to work?

12 A By train. I would take the N train  
13 to Lexington and 60th Street, East 60.

14 Q So it was just one train?

15 A Yes. And I had to walk two blocks,  
16 two -- two or three blocks. Two and a half  
17 probably.

18 Q Now, why did you leave Scores East?

19 A I got pregnant.

20 Q And did you decide to quit?

21 A I told -- I give them notice. I  
22 said, "I can't work anymore. I'm pregnant," and  
23 that was it, but I have to give them notice,  
24 like two weeks or a month.

25 Q Who did you give notice to?

1 VIKKI

2 A To the manager.

3 Q And who was the manager you gave  
4 notice to?

5 A Robert. I give notice to Harvey, one  
6 of the owners.

7 Q You gave notice to Harvey?

8 A Yes. I told him too. I see him once  
9 in the club, and said I told manager -- I mean  
10 Robert too. I said I'm pregnant. I can't work  
11 anymore. That was it.

12 Q When you say you had to give notice,  
13 who told you you had to give notice?

14 A Who told me was the rules. When I  
15 got hired, they told me if you're going to leave  
16 the club or anything, any type of -- if you're  
17 going to move you have to give notice two weeks  
18 to a month ahead.

19 Q Who told you that?

20 A The house mom.

21 Q Who was that?

22 A Was -- I mean, it was both.  
23 Marguerite or Lisa. On east side was Lisa. I  
24 mean, when I moved to the east side it was Lisa,  
25 because I asked her when I got pregnant.

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VIKKI

2 I said, "Lisa, I'm pregnant." She  
3 was saying just tell Robert, you know, two  
4 weeks, or Harvey, and that's what I did. I gave  
5 notice, and I am not working anymore.

6 Q And you told them that you were  
7 pregnant?

8 A Yes.

9 Q Now, what is Harvey's last name?

10 A I don't know.

11 Q But you knew him as one of the  
12 owners?

13 A I believe, yes. Yes. He -- that's  
14 how you pretend yourself. That's how he  
15 pretend. He was one of the owners. I don't  
16 know.

17 That's -- I mean, everybody -- you  
18 know, even when we had to do our meetings, he  
19 was one of the owners. I don't know.

20 Q When you say you had to do  
21 meetings --

22 A When there was a meeting in dressing  
23 room, like every other week or every four days  
24 or something, you had to -- all the girls  
25 together in the dressing room. Like some

1 VIKKI

2 things, whatever they had to do meeting. I  
3 don't -- you know.

4 Q Okay. Now, how frequent were these  
5 meetings?

6 A Once a week or twice a week or once  
7 in two weeks. Depends whatever they had to say  
8 something to the girls or whatever they had to  
9 talk to us. They would do meetings in the  
10 dressing room.

11 Q Who -- who spoke during these  
12 meetings?

13 A Sometimes it would be the manager and  
14 Harvey, one of the owners, and wherever --  
15 sometimes was different people.

16 I don't remember. I don't talk for  
17 such. I mean, whatever they had to talk about.  
18 I don't remember.

19 Q Do you remember any of the issues  
20 that were discussed at these meetings?

21 A I remember the issue had to sell  
22 bottles all the time, about the VIP rooms. They  
23 were going after us.

24 You have to -- you know, they go  
25 each -- after each girl. "You went for this

1 VIKKI

2 kind of hours. If you going to go one more  
3 time, if you're going to continue that, and  
4 don't sell bottles, that's how we make the  
5 money. You have to push to sell bottles." And  
6 this was more particular meeting. More going  
7 after.

8 Q You were talking about the VIP rooms.

9 A Yes.

10 Q What's that?

11 A VIP room is -- that's a room. And  
12 you -- it's for an hour. And you have to dance.  
13 It's a private room.

14 Q You danced in the private room?

15 A Yes.

16 Q And who decided or how was it  
17 determined how much you would get paid to dance  
18 in the private room?

19 A The Scores would decide. I would get  
20 \$500 and plus the room, whatever the room was,  
21 1,500, 1,200.

22 I don't know. Was some money. You  
23 know, it was -- different rooms was different  
24 prices, or I don't remember how the rooms were.

25 Q You're talking about the room price?

1 VIKKI

2 A Yes. I mean, I don't know about the  
3 room prices, how they going to -- you know, how  
4 they charge, but was about 12 to 1,500 or a  
5 thousand. I don't know how they -- about the  
6 room. I know I will make 500.

7 Q You knew you would make \$500 to go  
8 into a room?

9 A Yes.

10 Q Always?

11 A Always \$500. Yes.

12 Q Could you negotiate more or less?

13 A No, because I would be in trouble and  
14 was not part of the -- no.

15 Q That was for one hour?

16 A Yes.

17 Q When you say you would be in trouble,  
18 what makes you think you would be in trouble?

19 A Because if I was saying, you know,  
20 for more, was -- you know, they would go after  
21 me and say, "You know what? You're fired. Why  
22 you ask the customer for more money?"

23 Q Who is they? Who was --

24 A The staff. Whatever. The host could  
25 be -- you know, was so many people over there,

1 VIKKI

2 the host, because I want to talk to them," and  
3 for a price and stuff.

4 Q So what is it that the host would  
5 explain to the customer?

6 A They would explain the room and how  
7 much would be the room.

8 Q The room cost?

9 A Yes.

10 Q Okay. What else?

11 A How much I will get.

12 Q How much for you?

13 A Yes, and that's it.

14 Q And what did you say about tip-out?

15 A Tip-out. I mean, the customer would  
16 get two checks, one for the room and one -- I  
17 mean, one for the room money and one for, you  
18 know, my money.

19 I mean, you know, like two separate  
20 checks. One is 1,100 or 1,200 or 1,500,  
21 whatever it goes to cost the room.

22 He has to sign two checks. If he's  
23 going to pay by credit card, because always he  
24 had sign two checks. One for room and one for  
25 like the money I will get. And...

1 VIKKI

2 Q All right. So you're saying there  
3 were two checks.

4 You mean the person -- he put it on  
5 his credit card?

6 A Yes.

7 Q The customer would put it on his  
8 credit card, and he had to sign twice?

9 A Yes.

10 Q And you understood one signing was  
11 for the room and one was for your fee?

12 A Yes.

13 Q And did the host tell the customer  
14 how much your fee was?

15 A Yes. 500 for the girl and whatever  
16 it was for the room. It's -- price is --  
17 depends which room, you know. There was some  
18 different rooms. That's why.

19 Q And what did you mean by tip-out?

20 A By tip-out?

21 Q Yes.

22 A What I mean -- I mean I have to pay  
23 the house fee with 180.

24 Q The house fee was 180?

25 A Yes.

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VIKKI

2

Q Is that every day?

3

A Exact.

4

Q Okay.

5

A You have to pay the DJ. If I was -- if I was -- you know, he will put me off the stage if I had to now go -- if I didn't want to go on stage, I had to pay \$100, and if I was going -- you know, if I was going on stage I had to pay 40, but it was never 40, because if I was giving 40 he would put me more. If I had to go ten times he put me 20 times. It would be 60 or 80 or whatever.

14

Q You're talking about the DJ?

15

A I mean, you say tip-out, what I should tip out the entire night which -- I mean --

18

Q All right. We can go into that later. Let me just go back to the private room situation, okay?

21

You mentioned the tip-out at the private room.

23

Was there a separate tip-out in connection with the private room?

25

A The tip-out -- end of -- the

1 VIKKI

2 private -- when the room -- I mean, when hour is  
3 finished I had to tip the host.

4 He was getting tip from customer, and  
5 I had to tip him. You know, if I will not tip  
6 him, you know, they come to me, "Where's my  
7 tip?" Or --

8 Q So did you decide how much to give  
9 the host?

10 A It's pretty much ten percent. I have  
11 to tip them. Like figure 60, \$80.

12 Q Now, in addition to the money that  
13 the customer puts on the credit card for your  
14 fee, did the customer also give you money in the  
15 room?

16 A No. The customer would tip me when  
17 he signs the \$500. He will tip me right off  
18 there.

19 Like if the room is 500, or is ten  
20 percent -- is ten-percent surcharge, whatever it  
21 costs.

22 He can pay by credit card. If they  
23 pay funny money, it's 500, but the charge is 600  
24 on credit card, because it's ten-percent fee.

25 I don't know how that works for

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VIKKI

2 Scores. I mean, when he signs my money, it's  
3 600 on the credit card, but comes out to 500,  
4 because they keep ten percent.

5 Q What happens to that 500?

6 A I take the 500, but when he tips  
7 me -- I mean, he sign for 500, and he will say,  
8 "I give you \$100 tip or 200 or \$50," whatever he  
9 wants to tip me. I never get that tip. Host  
10 gets the tip, but I never understood why is  
11 that.

12 Q The host would get the tip?

13 A Yes.

14 Q You mean on the credit card he would  
15 put additional tip?

16 A For me, and I would -- I never got  
17 the tip. Almost three years I work over there,  
18 I never got a penny.

19 Q You got the \$500?

20 A Yes.

21 Q And how did you get the \$500?

22 A Funny money.

23 Q It was in funny money?

24 A Yes.

25 Q So that was all you received from the

1

VIKKI

2 customer?

3 A Yes.

4 Q Was the funny money?

5 A Yes.

6 Q Did you receive it all at once?

7 A Yes.

8 Q They would hand it to you before you  
9 had to dance in the room?

10 A No. You would start dancing, and he  
11 would come with the funny money. The host will  
12 come with the funny money after 10, 15 minutes,  
13 20 minutes, 30 minutes, but he will come.

14 Q The host would come into the room?

15 A Yes.

16 Q During -- while you were dancing --

17 A Yes.

18 Q -- the host would come into the room?

19 A Yes.

20 Q So you would get \$500 in funny money?

21 A Yes.

22 Q Did some customers give you money  
23 over and above that money?

24 A (Indicating)

25 Q Did --

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VIKKI

2 A No, because the customers always tip  
3 me by credit card to the -- you know, and I  
4 never got that money. They never give it to me.

5 You know, not me, but to all the  
6 girls, you know. And I never asked. But he was  
7 saying, "I left your tip," and if I would say,  
8 you know, to the customers I don't get the tip,  
9 you know, I would get a large trouble.

10 If I was asking, you know, if he tip  
11 with credit card where's my tip, I get in  
12 trouble, like forget it. And always -- I  
13 never -- I never asked them.

14 Q Okay. Let me go to the issue of the  
15 house fee.

16 Was the house fee always the same  
17 amount of money?

18 A It was 180.

19 Q Always 180?

20 A Saturdays was, I believe, 160 or 140.  
21 I don't remember. Because I --

22 Q Saturdays was less?

23 A Yes -- no. Sundays. I'm sorry.

24 Sundays was something -- I don't remember. It's  
25 been awhile for me I didn't work over there, and

1 VIKKI

2 it's changed, you know.

3 Q Let me ask you this. Was the house  
4 fee always the same amount of money?

5 A I mean, six days a week was -- no.  
6 I'm sorry. Mondays was 160. And rest of the  
7 days and Sunday was same thing.

8 Monday or Sundays was probably 140,  
9 160. Sometimes was -- Sunday was a little busy.  
10 I couldn't afford it.

11 I will pay probably \$80, because -- I  
12 mean, I couldn't, you know. I'm going minus,  
13 only I had to work those days. I was...

14 Q When did you pay the house fee?

15 A To the house mom.

16 Q When though?

17 A When? End of the night.

18 Q The end of the night you paid the  
19 house fee?

20 A Yes. I couldn't leave if I was not  
21 paying the house fee. I had to pay.

22 Q Could you pay the house fee in funny  
23 money?

24 A Yes.

25 Q Did you typically pay it with funny

1 VIKKI

2 money?

3 A Half and half. Whatever, you know.  
4 Sometimes, you know, I didn't have funny money  
5 and will pay cash, and I would go home with  
6 zero. Depends on the night.

7 Or maybe I cashed funny money and I  
8 think maybe I'm going to take -- I'm going to  
9 make funny money later.

10 I never did it. Was never busy, and  
11 I had to pay with my money, the money I made the  
12 night before.

13 Q So you could end up with less money  
14 than you started with?

15 A Oh, yeah. Of course.

16 Q So you could actually loose money by  
17 working a whole shift?

18 A Not one time. Some of the times.

19 Q Excuse me?

20 A It's -- yes. So many times that  
21 happened.

22 Q That happened several times?

23 A Yes. Like sometimes -- I mean, I  
24 will go to the manager. I will say I can't -- I  
25 can't pay. I'm not going to pay 180.